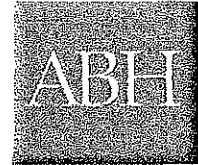


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Deborah Ekstrom CHAIR



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ASSOCIATION
FOR BEHAVIORAL
HEALTHCARE

May 17, 2010

Commissioner David Morales
Division of Health Care Finance and Policy
Two Boylston Street, 5th floor
Boston, MA 02116

Sue
Yong
Nancy

Dear Commissioner Morales:

The Association for Behavioral Healthcare (ABH), formerly Mental Health and Substance Abuse Corporations of Massachusetts, Inc., (MHSACM) is a statewide association representing eighty-nine community-based mental health and substance abuse provider organizations. Our members are the primary providers of publicly-funded behavioral healthcare services in the Commonwealth, serving approximately 117,000 Massachusetts residents daily and employing 22,000 people.

On behalf of the membership of ABH, thank you for the opportunity to submit comments relative to 114.5 CMR 21.00: *Health Care Claims Data Submission* and 114.5 CMR 22.00: *Health Care Claims Data Release*

ABH is encouraged by the creation of these regulations and applauds the Division for its efforts. As you stated in a recent blog post, the All Payer Claims Database (APCD) "will offer like never-before, a broad understanding of health care costs and medical service utilization across institutions and populations." ABH feels that the APCD has great potential to offer insight into the state's healthcare system, control costs, and improve service provision.

We do, however, urge the Division to take steps to ensure that these regulations do not increase providers' administrative burdens. As you know, providers already submit data to both the state and payers and our members are concerned about substantial changes to data submission requirements that may increase their administrative burdens significantly.

Thank you for your consideration.

Sincerely,

Vicker V. DiGravio III
President/CEO